

Timothy D. McNair

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September 13, 2005

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Re: Abby Conley v. County of Erie, et al.

Gentlemen:

I have been unable to secure dates from your offices for depositions and the only dates you have suggested for depositions are days when I am not available.

I suggest that we make a joint request to the judge for a 45-day extension of discovery to get these depositions scheduled and completed.

Please advise me of your positions on this as soon as possible. Of course, if I do not hear from you I will go ahead and file a Motion indicating that your positions are unknown. Feel free to use E-mail, as that is the most efficient way to contact each other.

Thank you.

Very truly yours,

LAW OFFICES OF TIMOTHY D. McNAIR

By


Timothy D. McNair, Esquire

TDM/may

cc: Abby B. Conley

Anthony Angelone, Esquire (via Facsimile - 868-0626)